

# **SDMS US EPA REGION V -1**

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DOCUMENTS.



156180 2400  
**Environmental Protection Agency**

**2200 Churchill Road, Springfield, Illinois 62706**

618/345-4606

Refer to: St. Clair County - LPC 163 121 08 - Sauget/Cerro Copper  
ILD080018914

November 20, 1981

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Cerro Copper Products Company  
Route #3 and Alton - Southern R.R.  
Sauget, Illinois 62202

Gentlemen:

On November 5, 1981, a representative of the Illinois Environmental Protection Agency conducted an inspection of the Cerro Copper Products Company located at Route 3, Sauget, Illinois. A copy of the inspection report is enclosed for your information. During this inspection the following violations were observed:

- ✓ 1. The inspection schedules and inspection logs had been established, however, they had not been implemented. This requirement is pursuant to 40 CFR 265.15 and 265.174.
- ✓ 2. Personnel training records did not include job title, descriptions of training or records of training for each position at the facility related to hazardous waste as required by 40 CFR Part 265.16(d).
- ✓ 3. The facility's contingency plan lacked a list of all emergency equipment at the facility, including the location and a physical description of each item on the list, and a brief outline of its capabilities as required by standards applicable to generators contained in 40 CFR 265.52(e).
- ✓ 4. The facility's Contingency Plan lacked a list of names, addresses, and phone numbers of all persons qualified to act as emergency coordinators as required by 40 CFR Part 265.52(d).

START 12/4/81  
Jim + Don C.

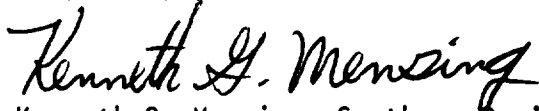
BACK  
ATTACH. 1

BACK  
ATTACH. B

BACK  
ATT. A

You are hereby requested to provide written documentation to this office, within 15 days after receipt of this Notice of Violation, informing us of action taken to correct the above noted violation. Failure to do so may result in further enforcement action being initiated by the USEPA. Your response should be submitted to the undersigned. If you have any questions, please contact Diane M. Spencer of my staff at the above number.

Very truly yours,

A handwritten signature in black ink, reading "Kenneth G. Mensing". The signature is written in a cursive style with a large, stylized "K" and "M".

Kenneth G. Mensing, Southern Region Manager  
Land Field Operations Section  
Division of Land/Noise Pollution Control

DMS:jlr

Enclosure: Inspection Report

cc: Division File  
Southern Region  
Region V - USEPA

16312108  
STATE IDENTIFICATION NUMBER  
(If Applicable)

1LD080018914  
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
Form B Generator Inspection\*  
(40 CFR Part 262)

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I. General Information:\*

- (A) Installation Name: CERRO COPPER PRODUCTS Co.  
(B) Street: ROUTE 3 & ALTON-SOUTHERN R.R.  
(C) City: SAUGET (D) State: ILLINOIS (E) Zip Code: 62202  
(F) Phone: 618/337-6000 (G) County: ST. CLAIR  
(H) Date of Inspection: 11-5-81 Time of Inspection (From) 10:30a (To) 11:45a  
(I) Weather Conditions: RAINY, OVERCAST, ~50°

(J) Person(s) interviewed	Title	Telephone
<u>JIM JOHNSON</u>	<u>MGR. ENGINEERING</u>	<u>618/337-6000</u>
<u>DAVE DURHAM</u>	<u>PURCHASING DEPT.</u>	<u>618/337-6000</u>

(K) Inspection Participants	Agency/Title	Telephone
<u>JIM JOHNSON</u>	<u>CERRO / ENGINEERING MGR.</u>	<u>618/337-6000</u>
<u>DIANE SPENCER</u>	<u>I.E.P.A. / EPS</u>	<u>618/345-4606</u>

(L) Preparer Information

Name	Agency/Title	Telephone
<u>DIANE M. SPENCER</u>	<u>I.E.P.A. / ENV. PROT. SPECIALIST</u>	<u>618 / 345-4606</u>

\*Do not use this form if Generator is also a treatment, storage, and/or disposal facility.  
Complete form "A" if the Generator is also a TSD facility.

## II. BRIEFLY DESCRIBE SITE ACTIVITY

THE FACILITY IS INVOLVED IN THE MANUFACTURING OF  
COPPER TUBING. AT THIS TIME, HAZARDOUS WASTE GENERATED  
AT THE SITE IS STORED FOR LESS THAN 90 DAYS BEFORE  
BEING SHIPPED OFF-SITE. FOURTEEN (14) DRUMS OF THE  
SAME WASTE MATERIAL WERE OBSERVED AT THE FACILITY.

## III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID number of generator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Name and EPA ID Number of transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

\*Not Inspected

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A AT THIS TIME

#### IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(C) If required, are placards available to transporter?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

WASTE WAS NOT BEING SHIPPED DURING THE INSPECTION.

\*Not Inspected

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	Yes	No	NI*	Remarks
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?		✓		WEEKLY INSPECTIONS OF CONTAINERIZED STORAGE NOT YET IMPLEMENTED
4. If wastes are stored in tanks, are the tanks managed according to the following requirements:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?		N/A		NO TANK STORAGE
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?		N/A		
c. Do continuous feed systems have a waste-feed cutoff?		N/A		
d. Are required daily and weekly inspections done?		N/A		
e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)		N/A		
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)		N/A		
g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?		N/A		

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Record the following information:

Tank capacity? \_\_\_\_\_ gallons

N/A

Tank diameter? \_\_\_\_\_ feet

Distance of tank from property line? \_\_\_\_\_ feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	NI*	Remarks
A. Do Personnel training records include: <span style="background-color: black; color: black;">[REDACTED]</span>				
1. Job Titles?	_____	✓	_____	NO PERSONNEL TRAINING RECORDS AVAILABLE
2. Job Descriptions?	_____	✓	_____	
3. Description of training?	_____	✓	_____	PROGRAM STILL NEEDS TO BE DRAWN UP
4. Records of training?	_____	✓	_____	
5. Have facility personnel received required training by 5-19-81?	_____	✓	_____	
6. Do new personnel receive required training within six months?	_____	✓	_____	
B. Preparedness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	_____	✓	_____	

\*Not Inspected

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2. If required, does this facility have the following equipment?

a. Internal communications or alarm systems?

☒

b. Telephone or 2-way Radios at the scene of operations?

☒

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

☒

Indicate the volume of water and/or foam available for fire control

CITY SUPPLY

3. Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

☒

b. Is emergency equipment maintained in operable condition?

☒

4. Has owner/operator provided immediate access to internal alarms (if needed)?

☒

5. Is there adequate aisle space for unobstructed movement?

N/A

C. Contingency Plan and Emergency Procedure (Part 265, Subpart D)

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1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)

✓

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

✓

FACILITY HAS OWN FIRE  
BRIGADE AND SAFETY DEPT.  
NURSE IS ON STAFF.  
OUTSIDE AID NOT REQUIRED

c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.

✓

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?

✓

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

N/A

EVALUATION PERTAINING TO  
THE HAZARDOUS WASTE  
NOT PROBABLE

2. Are copies of the Contingency Plan available at site and local emergency organizations?       ✓      

3. Emergency Coordinator

a. Is the facility emergency Coordinator identified?       ✓      

b. Is coordinator familiar with all aspects of site operation and emergency procedures?       ✓      

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?       ✓      

4. Emergency

If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in §265.56?       N/A      

VI. RECORDKEEPING AND REPORTING  
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?       ✓      

(B) Has the generator submitted Annual Reports and Exception Reports as required? Base       N/A AT THIS TIME      

VII. INTERNATIONAL SHIPMENTS  
(Part 262 Subpart E)

(A) Has the installation imported or exported hazardous waste?       ✓      

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(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste,  
has a generator:

a. Notified the Administrator  
in writing? N/A

b. Obtained the signature of the  
foreign consignee confirming  
delivery of the waste(s) in the  
foreign country? N/A

c. Met the Manifest requirements? N/A

2. Importing Hazardous Waste,  
has the generator: N/A

Met the manifest requirements?                     

VIII. Remarks

REMARKS: THE FACILITY IS REQUIRED TO DRAW UP AND IMPLEMENT  
A PERSONNEL TRAINING PROGRAM WHICH IS UPDATED ANNUALLY.  
AN EMERGENCY COORDINATOR SHOULD ALSO BE DESIGNATED AND  
TRAINED IN IMPLEMENTING THE CONTINGENCY PLAN AS NEEDED.  
DRUMS OF HAZARDOUS WASTE SOLVENT WERE STORED CLOSE  
AND IN GOOD CONDITION. NO INSPECTION OF THE AREA IS CONDUCTED  
PRIOR TO THE 90 DAY STORAGE LIMITATION, A TANK TRUCK  
PUMPS THE WASTE MATERIAL FROM THE CONTAINERS FOR  
RECYCLING.

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